NiAGARA FALLS

UMETCO MINERALS PROJECT DATA ROOM

CONFIDENTIAL, PROPERTY OF UMETCO MINERALS CORPORATION

UNIT

IA UMETCO IN THE UNITED STATES

SECTION NUMBER AND TITLE

7.8 Metals/Flux Operations, Niagara Falls, NY

7.8.1 Waste Disposal Summary

7.8.2 List of Licenses and Permits

7.8.3 Licenses and Permits

DATE PREPARED :

UMETCO MINERALS PROJECT DATA ROOM

CONFIDENTIAL, PROPERTY OF UMETCO MINERALS CORPORATION

UNIT

SECTION NUMBER

AND TITLE : 7.8.1 Waste Disposal Summary

DATE PREPARED :

UMETCO MINERALS CORPORATION METALS/FLUX OPERATIONS NIAGARA FALLS, NY June 1, 1984

WASTE DISPOSAL SUMMARY

I. Off Site Disposal - Solids

Office refuse and production floor trash (non-hazardous - paper, wood, containers, etc.)

Metals - 160 yards³, not compacted,/operational month

Metals - 150 yards³, compacted,/operational month

Linde - 100 yards³, not compacted,/operational month

Waste water treatment sludge - non-hazardous, refer to attached flux constituent matrix.

. Linde - 400 lbs./operational hour

Miscellaneous off grade MnAl, CrAl, FeAl Metals - volumes vary with production levels and quality levels.

Vanadium furnace slag
 Metals - Approx.2,000,000 lbs./year - temporary storage on site.
 (Potential sale.)

Note: The above solids are received by a local contractor through various divisions - CECOS International, Niagara Sanitation or Browning Ferris Incorporated. The landfill is located at 56th and Pine Streets, Niagara Falls, New York.

Scrap Iron

Metals and Linde - scrap metal sold to local vendor for eventual recycling - several tons/year.

II. On Site Disposal - Solids

The cross hatch in grid 3-B of the attached plot plan represents an accumulation of spent carbon paste furnace liners and off grade flux.

The cross hatch in grid 6, 5-B represents an accumulation of scrap flux and trash.

The cross hatch in grid 6-C, B represents an accumulation of furnace slag that will eventually be removed from the property. (Potential sale)

Approximately 200 gallons of water/day is discharged from the west side of Building #104, to a pond which overflows to the city sewer & POTW. This discharge is a result of flushing out the "zig-zag" blender. It is estimated that ten lbs. of bonded flux is carried in the 200 gallons plus some sodium silicate.

III. Liquid Discharges

Discharge (Metals) to city sewer monitored discharges presently in compliance with city standards (per their SPDES Permit) for flow, COD and SS. Niagara Falls is presently modifying permits to include checks for SOC and priority pollutants. Indications thus far are that we will not be cited to correct any serious problem.

Future potential problem areas are;

- A. 99 Building Halides operation presently discharges VCl4 and VOCL3 tank flush water to sewer and also scrubber backwash to city sewer attempting to neutralize with caustic and dilute with water.
- B. W operations discharges from bubbler tanks to #1 monitoring station. EPA's present efforts to formulate guidelines for W effluent (non-ferrous forming survey, etc..) may impact on our operations in future.

The discharge from Linde's wastewater treatment plant is routed directly to the Niagara River. This flow represents 130,000 gallons per operational day and is joined by non-contact cooling water for a total daily flow of 2,000,000 gallons. This outfall is subject to the restraints of a SPDES permit. To date, we have been in strict compliance with the chemical and constituent tolerances in the permit.

IV. Air Discharges

A summary of all air discharge points is offered on the attached plot plan. With the exception of point #9001 (Linde) and Halides operations, all points are operating under a current permit and are in compliance. Naturally, mechanical breakdowns are experienced, but in all cases they are promptly remedied.

Presently, our primary concern is the plume discharged by the submerged arc flux furnace located in Building #98 - air emission point #9001 (see attached plot plan). We have designed and implemented five generations of pollution control hardware over the last six years at a cost of well in excess of \$1,000,000. We presently experience opacity excursions although we are generally in compliance. The probability of an excursion is greatest during the first eight hours of furnace startup and in the manufacture of flux grades 0091, 709-5 and 20. In response to these excursions, during April of 1984, the New York State DEC performed a series of stock samples with total particulate and fluorides as their areas of particular interest. It is anticipated that the results of this testing will not be available for several months. Similar tests, initiated by UCC, were performed in September of 1982.

Data collection and analysis are currently being performed to eliminate the opacity problems. Surfactants are being investigated to supplement particulate precipitation along with mechanical revisions to the scrubbing towers.

Halides operations pose potential future problems for emission to the atmosphere. To date, no permit for this area has been obtained.

Presently, we are holding in storage several hundred sample cans that have a volume of approx. 500 in.3. The contents of these cans represent a cross section of the products manufactured by the Metals Division for the last 50 years. The disposal of this collection may require considerable investigation and a search of the appropriate state and federal regulations.

So that you may better understand the chemistry of fused flux manufacture, the attached schedule indicating the fused fluxes manufactured and their constituents is provided.

Please advise if further detail or clarification is required.

WEE:EAC/sjd

ATTACH.

E. A. Casciani

ATTACHMENT I

EXHIBIT "C"

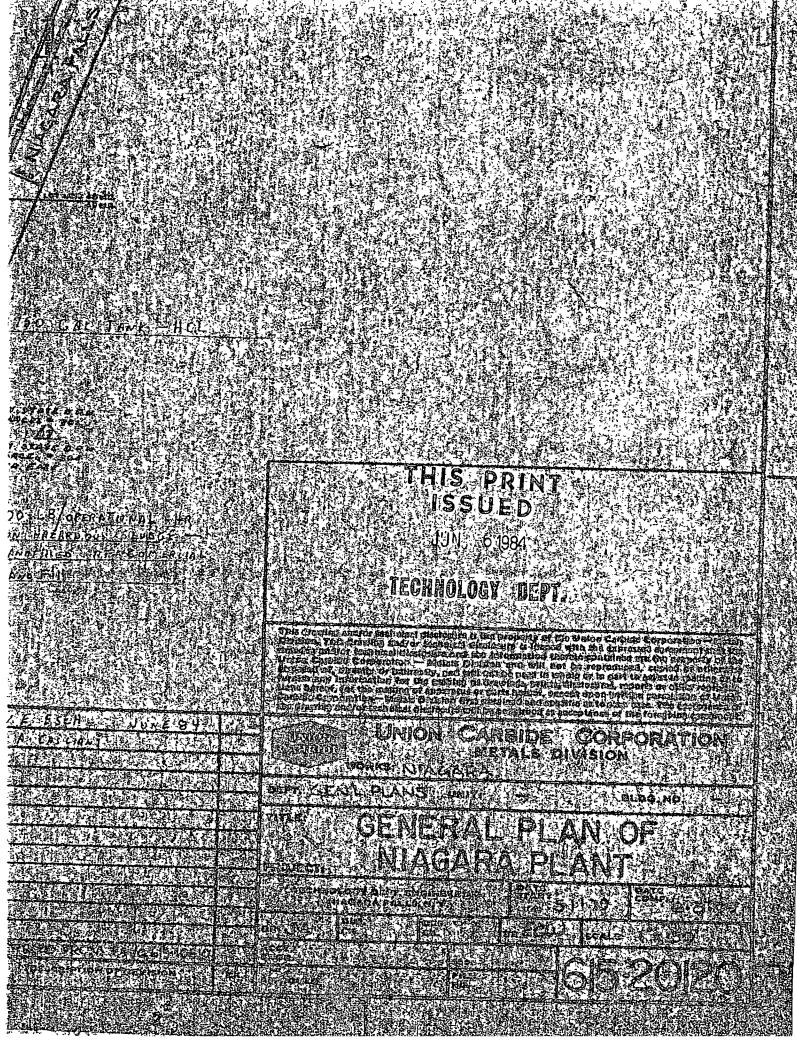
Waste Disposal Contract 100-25452

Release No. 615-309924

Code 37-B

B. MATERIALS - DESCRIPTION

I.	Element	Basic Grades 20, 80, 124, 709-5, 0091 %	Acid Grades 50, 55, 60, 85 85I %
	Water Fluoride Calcium Magnesium Iron Aluminum Lead Zinc Manganese Other	65.3 3.2 6.2 11.3 1.1 4.4 0.1 0.1 7.8 0.5 100.0%	59.6 8.6 17.7 1.2 1.7 1.8 1.0 0.3 7.3 0.8 100.0%
	Item	Basic	Acid
~ ~ <i>*</i>	Physical state	Semi Solid	Semi Solid
	Specific Gravity	1.3	1.3
	Viscosity	Medium	Medium
	Flash Point	None	None
	рН	9	7



UMETCO MINERALS PROJECT DATA ROOM

CONFIDENTIAL, PROPERTY OF UMETCO MINERALS CORPORATION

UNIT

SECTION NUMBER

AND TITLE : 7.8.2 List of Licenses and Permits

DATE PREPARED :

Date: 2/84

Address Union Carbide Corp.

137 47th St.(Box 66)

Niagara Falls, NY 14302

Name On Permit	Title	Permit Number	Agency	Permit Term/ Expiration	Transferable/Comments
UCC Metals Niagara Falls	Cert. to Operate (Air) 15 permits	291100-0360- C 0001 WI C 0005A WI C-0005B WI C-00006 WI02 C-00006 WI03 C-00006 WI04 C-00006 WI C-00006 WI C-0008A WI A-0103A I C-00701 WI A-00702 I C-00703 WI A-00704 I A-00704 I	NY-Dept. Environ- mental Conserva- tion - Div of Air	8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/87 8/1/88 8/1/87 8/1/88	No information on certificates
UCC Metals	Sewer Pennit (POTW)	NF #8	City of Niagara Falls	Contract to be negotiated 2nd Qtr 1984	No information
UCC Linde	SPDES State pollutant Discharge elimi- nation system discharge permit	NY-000 0060	NY-Dept. Environ- mental Conservation	8/1/86	Metals to operate Plant for Linde Div.
UCC Mining & Metals Niagara	Radioactive Materials License	950-0139	NY DeptLabor	Valıd untıl Tenmınatıon	License transferred to Cecos Inter- national when property sold 1/25/83

Address Union Carbide Corp.

137 47th St.(Box 66)

Niagara Falls, NY 14302

Name On Permit	Title	Permit Number	Age	enc y	Permit Term Expiration	n/ Transferable/Comments
UCC Metals	Cert. of Regis. Hospital X-Ray	31009436	NY Dept	of Health	4/1/85	Will not renew-offered to Investment Recovery as surplus
UCC	Registration of Sources of Radiation		NY Dept o	of Labor	None	Received 7/2/65 - No information X-Ray Fluoroscope-Standby unit
UCC Linde Flux	Regis. of Source of Radiation	R-1995 Registered 1/31/72	NY Dept.	of Labor	None	To transfer - Person in charge (Condition #9) only from Linde to Metals
UCC	Solid Waste Disposal for Hazardous Wastes	NYD 000692228	No	Addıt	onal]	Information

Address Union Carbide Corp.

Sinsions Ave, (Box 747)

Niagara Falls, NY 14302

Name On Permit	Title	Permit Number	Agency	Permit Term/ Expiration	Transferable/Comments
UCC Linde	Cert. to Operate (Air) (19 permits)	IZ91100-0359 01203 WI 01203 WI01 01203 WI02 01203 WI03 01203 WI04 01201 WI 01202 WI 01204 WI 01301 WI 01302 WI 0956 A+B WI 01001 WI 00955 WI 09062-68 WI 09001 WU 09001 WI02	NY-Dept of Environ Conservation - Air (7 permits)	8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88 8/1/88	No Transferable information Metals to operate Plant for Linde Div.

UCC Metals - Miagara Falls

PERMITS & LICENSES BETWEEN UCC METALS & GOV'T AGENCIES

- 1.) FCC License #KED762 Manufacturers Radio Service License mobile license KJ7349
- 2.) NYS DEC Emission Permits Certificates to Operate Air Contamination Sources

- #21291100-0360-00001 Master Alloy #2I291100-0360-0005A UCAR W Bubbler #2I291100-0360-0005B UCAR W Sizing #21291100-0360-00006 CóF Furnaces #2I291100-0360-0008A Bldg. 32 Packing #2I291100-0360-0103A VCWC #21291100-0360-00701 Old UCAR Oven #21291100-0360-00702 Old UCAR Compactor #2I291100-0360-00703 Old UCAR Blending #21291100-0360-00704 New UCAR Oven #21291100-0360-00705 New UCAR Blend. & Compact.

- 3) Division Sewer Permit City of Niagara Falls Permit NF #8
- 4.) Industrial Wastewater Contract w/ City of Niagara Falls 3/1/71
- 5.) US EPA Outfall discharge permit NPDES Permit No NY0000060 held by Linde Flux with addendum to Hooker

UMETCO MINERALS PROJECT DATA ROOM

CONFIDENTIAL, PROPERTY OF UMETCO MINERALS CORPORATION

UNIT :

SECTION NUMBER

AND TITLE : 7.8.3 Licenses and Permits

DATE PREPARED :

RGD/RHM/RGD/FILE Duojento

UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT 06817 LAW DEPARTMENT E3-287

March 2, 1984

WAR " 7 9784

Mr. Steven J. Doleski Regional Permit Administrator New York State Department of Environmental Conservation Region 9 600 Delaware Avenue Buffalo, New York 14202-1073

JEE NOTE W PG 3

Attention: Mr. Michael McMurray

Re: SPDES Permit No. NY-000 0060

Dear Mr. McMurray:

This letter confirms our telephone conversation of March 1, 1984 with Mr. Doleski. The above-referenced permit was originally issued to Union Carbide Corporation - Linde Division, the owner and operator of the Linde Flux Plant, Simmons Avenue (Box 747), Niagara Falls, New York 14302. The permit was recently transferred to Union Carbide Corporation - Metals Division in response to a request from Mr. George Rees of the Linde Flux Plant to the Department of Environmental Conservation ("Department"). I understand that a second request, dated February 16, 1984, is now pending before the Department, to transfer the permit back to Union Carbide Corporation - Linde Division.

It is the intent of this letter to clarify the current ownership/ operation status of the plant for the Department. Union Carbide Corporation has been and continues to be the owner of the Linde Flux Plant. The only recent change is that the Metals Division of Union Carbide Corporation has taken over operating responsibilities from the Linde Division of Union Carbide. Union Carbide intends to transfer to Union Metals Corporation ("UMET"), a wholly-owned subsidiary of Union Carbide, certain assets and liabilities of its Metals Division. One result is that UMET will become the operator of the Linde Flux Plant. Union Carbide Corporation will continue to be the owner.

As discussed on March 1, 1984, it is your preliminary determination that Union Carbide Corporation, as owner of the Linde Flux Plant, should be the permittee for purposes of the State Pollutant Discharge Elimination System (SPDES) permit program. If this preliminary

Mr. Steven J. Doleski March 2, 1984 Page 2

CLD: mh

determination is confirmed, I would appreciate your advising Mr. Rees in writing that the name of the permitee should properly be Union Carbide Corporation - Linde Division. Mr. Vic Gustavson, the Linde Flux Plant Manager, will then resume the responsibility for signing discharge monitoring reports and other reports required to be sent to the Department.

If you determine that the permit should be held by UMET, as operator of the Linde Flux plant, please advise me as soon as possible. In such an event, Union Carbide and UMET are prepared to request that the Department transfer the SPDES permit to UMET.

If you have any questions or need additional information, please do not hesitate to call me at 203 - 794-6233.

Thank you for your assistance.

Very truly yours,

Carri Ducinia

Carol L. Dudnick

bcc: F. T. Temple

G. Rees

J. F. Frost *

* Jack: Under certain permit programs, only authorized representatives of the Corporation are authorized to sign reports, e.g., discharge monitoring reports under the SPDES program. The signatory policy issued by HS&EA will have to be reviewed and delegations made to appropriate persons (or positions) once permit transfers are approved. Carol

New York State Department of Environmental Conservation 600 Delaware Ave., Buffalo, NY 14202-1073 716/847-4551

Date: January 18, 1984

Mr. F. T. Temple, Plant Manager Union Carbide Corp, Metals Division P.O. Box 66 Niagara Falls, N. Y. 14302

Re: Notice of Intent to Modify Pollutant Discharge Elimination System Permit No. NY- 000 0060

DRA # 90-84-0054

Formerly: Linde Welding Flux Plant (C) Niagara Falls, Niagara County

Dear Mr Temple

This is to inform you that pursuant to Environmental Conservation Law, Article 17, Title 8 (McKinney's) and 6 NYCRR, Part 757, the New York State Department of Environmental Conservation has made a determination to modify your referenced Pollutant Discharge Elimination System Permit as

igsqcup shown on the enclosed revised Permit which supercedes the previous Permit.

shown on the enclosed revised Permit pages which supercede (and/or supplement) previous Permit pages. The remainder of the Permit continues in full force and effect. Page No. 10f 5

follows:

This modification will become effective immediately unless you either submit, within ten days, a written statement giving reasons why the permit should not be so modified or petition for a hearing, and if no written objection is received by this office from the Regional Administrator of EPA. Any such petition for a hearing shall contain specific evidence to support your contention that a hearing is necessary in accordance with 6 NYCRR, Part 621.

Respectfully,

Steven J. Doleski

Regional Permit Administrator

Steven J. Doleski

Enclosure

MJM cc: Reg. # 9 Div. of Water

Albany PDES Administrative Section

Dr Baker, EPA

Dr. Spear, EPA

Niagara County Health Dept.

Eriel Niagara Reg. Plan. Board

Region #9

Dr. Spear-EPA,

Kiagara Co. Health Dept.

Efie/Niagara Co. Reg. Plan. Board

Mr. Crandall - BPC

Mr. Adamczyk - BIP

Edison, NJ

Dr. Baker-EPA, Region II

Effective Date (EDP)

Pacility ID No.

: NY- 000 0060 '

: August 1, 1981

Expiration Date (ExDP) : August 1, 1986

Modification Dates: September 2, 1983 and

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION January 18, 1984 STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM (SPDES)

DISCHARGE PERMIT

Special Conditions (Part I)

This SPDES permit is issued in compliance with Title 8 of Article 17 of the Environmental Conservation Law of New York State and in compliance with the Clean Water Act, as amended, (33 U.S.C. \$1251 et. seq.) (hereinafter referred to as "the Act").

Permittee Name:

UNION CARBIDE CORPORATION, METALS DIVISION, Attn: Mr. F.T. Temple

Plant Manager

Permittee Street:

Simmons Ave. & 47th Street

Permittee City:

Niagara Falls

State: New York

Zip Code: 14302

is authorized to discharge from the facility described below:

Facility Name:

Union Carbide - Metals Division

Facility Location (C,T,V): Niagara Falls (C)

County: Niagara

Facility Mailing Address (Street): P.O. Box 66

Facility Mailing Address (City): Niagara Falls State: New York Zip Code:

14302

into receiving waters known as:

Upper Niagara River, Class A

Special Waters Index No. 01-158 Latitude 43° 04' 18" 79° 01' 10" Longitude

in accordance with the effluent limitations, monitoring requirements and other conditions set forth in this permit.

This permit and the authorization to discharge shall expire on midnight of the expiration date shown above and the permittee shall not discharge after the expiration date unless this permit has been renewed, or extended pursuant to law. To be authorized to discharge beyond the expiration date, the permittee shall apply for permit renewal as prescribed by Sections 17-0803 and 17-0804 of the Environmental Conservation Law and Parts 621, 752, and 755 of the Departments' rules and regulations.

By Authority of Steven J. Doleski, Regional Permit Administrator

Designated Representative of Commissioner of the

Department of Environmental Conservation

January 18, 1984 Steven J. Doleski Date Signature

91-20-2(6/80)Pg.1

LINDE ENVIRONMENTAL PERMITS

WATER

SPDES Permit # NY 000 0060 Effective Date 8/1/81 Expiration Date 8/1/86 Modification Date 9/2/83

Monitor at Effluent Outfall 001

	Daily Avg. 1b./day	Daily Max. <u>lb./day</u>	Frequency	Type Sample
Flow Suspended Solids Fluoride TKN (N) Lead Total Temperature pH	50 35 42 Monitor of	100 70 47 11y Mg/1 90°F 8.5	Weekly Weekly Weekly Monthly Monthly Monthly Weekly	24 hr. 24 hr. composite 24 hr. composite 24 hr. composite 24 hr. composite Grab Grab
002 Sampling Point				
Lead Total Oil & Grease	Monitor of 14.6	nly Mg/l 22	Monthly Monthly	24 hr. composite Grab

Discharges are net values

Incoming water - effluent = net value





US DEPARTME	1 thru 21 Use reverse for continuation if needed REV. S-791						
ANIMAL AND PLANT HI	1 NAME AND ADDRESS OF APPLICANT (Include ZIP Code)						
FORWARD THIS APPLICATION U. S. Department of A Animal and Plant Heal Plant Protection and Q	R. J. Klotzbach Director of Technology Mineral Products - Metals Division						
Federal Building Hyattsville, Maryland 20782			P.O. Box	579, Niag	gara Falls,	25 Royal Avenue NY 14302	
2 TYPE OF SOIL	3 COUNTRY OF ORIGIN	4 DEPTH TAKEN FROM SURFACE	5 NUMBER OF SAMPLES	6 APPROX WEIGHT OF EACH	(before its release ITS INTENDED U		
Crushed	V	,			1	heck preferred treatment)	
A rock samples	Various Foreign				Dry	Heat Steam Heat S, item 19 must be signed by	
8	Countries				the Head of	the Laboratory receiving the	
	<u> </u>				soil)		
С		0 1455	PACKAGING 50	<u> </u>			
8 NUMBER OF SHIPPING COM	NTAINERS	S METHOD OF		- -			
Various 10 METHOD OF SHIPMENT	<u> </u>	11 SHIPPED BY		12 PORT O	FARRIVAL	13 DATE OF ARRIVAL	
☐ Mail ☐ Cargo	Baggage	X Air	X Surface	New Yo		Various	
14 DESTINATION WHERE SO Union Carbide Corp.			15 ARE OTH TWO YEA	DS1	_	ATED WITHIN THE NEXT	
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16 IS SOIL TO BE USED AS G	ROWING MEDIUM		oles for as	isav and t	test		
Yes X No (if NO), state intended use)			- and			
Our first treat	ment oven dr	ying 260°F。	will steri	ilize			
18 METHOD OF FINAL DISP	OSITION (Autoclaus	ng incineration, or c	other)				
Approved dispos	al sites		Tan ====	INF NUMBER		21 DATE	
19 SIGNATURE OF APPLICA sign 14 you cheched YES in	INT OF AGENT (Laitemy)	poratory Head	(716) 2	78-3157		8/2/83	
/s/ Robert J. Klotz							
	TO 9	BE COMPLETED BY	<u>/////////////////////////////////////</u>	ATORY OFF	CIAL		
COMMENTS	10 6						
SIGNATURE (Or verbal approx	val 🔝)		TITLE A M		<u> </u>	DATE	
			1755	T. Direct	L. A/VA AIA	8/12/83	
Walter T.	Brown	,,,,,,	DIV CALA	any LNdu.	ty NYDAM		
	TO BE COMPL	ETED BY PLANT P	HOTECTION AN	UUARANT	THE PHUGHAMS	nolicant named ahova to	
FEDERAL PERMIT Under au move the soil described, subject	t to the following co.	nditions (Items 1 21	l ahove are condit	tions of this per	rmit, except as inuic	ateu below)	
1 Valid for shipments of	of soil not heat trea	ited at port of ent	try, only it Co	ompliance Ag	reement (FFQ FO	orm 519) has been completed	
and signed, and if this pe	rmit is countersign	ned by a field Plar	nt Protectio ai	nd Quarantine	e Officer		
2. To be shipp							
3. To be relea	sed withou	it treatmer	ent at the port of entry.				
4. To be used	only for r	ock assay	y and test and only in the				
laboratory	of the per	mittee in	Nıagara	Falls,	New York.		
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PPQ FORM 525

Previous editions may be used



INTERNAL CORRESPONDENCE -

METALS DIVISION

To (Name) Division

ALL EXPLORATION OFFICES

(FOREIGN AND DOMESTIC)

PO BOX 579 4625 ROYAL AVE , NIAGARA FALLS, NEW YORK 14302

November 3, 1980

Originating Dept

MINERALS TECHNOLOGY

Answering letter date

Copy to

Location

Messrs. T. F. Ahearn

B. T. Hone

O. J. Malacarne

D. L. Mathias

D. G. Millenbruch

D. R. Sutphen

Mrs. C. J. Bates

Subject

Dept. of Agriculture Permit S-791 8/15/80 - 8/31/83 - Soil Samples

Our Department of Agriculture Permit to import foreign or domestically transfer soil samples has been renewed effective August 15, 1980, and expiring August 31, 1983. The permit number is S-791.

The Port of Arrival for all foreign samples is New York. All samples and containers should be marked on the label with the Permit Number and the expiration date. All shipments are to be sent to R. J. Klotzbach, Director, Union Carbide Corporation, Metals Division, Mineral Products Technology, P. O. Box 579, 4625 Royal Avenue, Niagara Falls, New York 14302. Telephone number 716-278-3423. All foreign samples sent through JFK should also include the notation, "ATTENTION: UCC CUSTOMS IMPORT DEPARTMENT." All samples must be in sturdy leak-proof containers.

Our handling of the samples and our contacts with customs would be expedited if each shipper would notify us in advance by telephone or letter. The contact at Niagara Falls is Mrs. Clare Bates, 716-278-3423.

Helpful information would be:

- 1. Shipping point and sample origin
- 2. Total weight
- 3. Number of packages or drums
- 4. Date of shipment (approximate will suffice)

Mrs. Bates will be the sample person handling the disposition of domestic samples and will be our primary contact with UCC International Distribution for all foreign samples arriving at JFK airport. Please help us service your samples.

RJK:cjb

Klotzbach

FOREIGN LOCATIONS

- Mr. B. W. Hawkins Australia
- Mr. Peter D. Danchin South Africa
- Mr. Alen Wolstencroft Tanzania
- Mr. Nigel G. Cawthorn England
- Dr. Peter Cotterill Zimbabwe

DOMESTIC LOCATIONS

- Mr. G. L. Schierman Alamo, Nevada
- Mr. J. E. Straka Albuquerque, New Mexico
- Mr. R. H. Von Holdt Casper, Wyoming
- Mr. J. S. Hollingsworth Grand Junction, Colorado
- Mr. F. L. Dedrickson Hot Springs, Arkansas
- Dr. W. B. DeAtley King City, California
- Mr. E. E. Nelson Missoula, Montana
- Mr. A. Lopez Reno, Nevada
- Mr. D. L. Beahm Riverton, Wyoming
- Mr. R. L. Nylund Uravan, Colorado

Canada

- Mr. Miles H. Russell Edmonton, Alberta
- Mr. J. J. Royall Vancouver, British Columbia

UCC Technology - Radioactive Materials and License; X-ray Producing Equipment and Registration

Source Material and License

Licensee: Union Carbide Corp., Metals Div.

4625 Royal Ave.

Niagara Falls, NY 4302

Radioactive Materials License Number 210-0090, Reference No. 2, with 10 amendments. Issued By: New York State Department of Labor, Division of Safety and Health

Source Materials Covered by License:

Sealed Source	,	Purpose		Qua	ntity	Prese	nt Loc	ation	
Cs 137	Floa	t Indica	ator	50	mC i	Stack Fu	rnace,	Bldg.	169
Cs 137	11	11		50	mC i	Storage,	Bldg.	143	
Cd 109	Port.	Isotope	Analyzer	3	mC i	Cabinet,	Bldg.	166	
Fe 55	11	11	11	20	mC i	11	11	##	
Pu 238	11	11	11	30	mC i	ŧi	11	11	
Co 57	11	11	11	3	mC i	11		11	

Other unlicensed source materials:

- Various radium sources, which cropped up during H. J. O'Hear's tenure, stored in Lab. 357, Bldg. 94.
- 2. Thorium oxide.

Note: $U_3^{0}_8$ as ore, tailings, and concentrate assumedly is covered by a general license, and gets shipped back to source of origin. No present accounting of on-site $U_3^{0}_8$ exists.

Number of persons exposed to source materials: 0. All sources are in storage.

Equipment and Registration

Registrant: New York State Dept. of Labor, Division of Safety and Health Registration No. L-0090

UCC owned and operated X-ray equipment:

Humber	Description	No. of workers <u>Exposed</u>		
2	50 kv; 35 ma Philips Electronics Inc., Manual	2		
	Powder X-ray Diffractomer			

Note: Attached is a list of Elkem owned and operated X-ray equipment, which at this time remains registered to UCC.

D. R. Brosnahan 5∕16/83



INTERNAL CORRESPONDENCE -

METALS DIVISION

137 47th STREET, P O BOX 66, NIAGARA FALLS, NEW YORK 14302

To (Name) Division Location

Mr. R. G. Beverly UCC-Metals Division Grand Junction CO 81502

Date

February 8, 1984

Originating Dept

Answering letter date

Copy to

E. A. Casciani W. E. Esch R. L. Miller

Permits & Licenses -Niagara Falls Plant

Bob --

Enclosed herewith are copies of all known air, water and radiation permits for the combined Niagara Falls Metals and Linde Flux operations.

Please note.

- 1. Agreement with City of Niagara Falls for treatment of wastewater is currently in force but due to a new discharge permit requiring extensive modifications to the tertiary treatment facility, contracts will be renegotiated, probably as early as April of this year.
- 2. I have included all known permits formerly held by the Linde Flux plant and currently in process of transfer to Metals under agreement reached re consolidation effective 1/1/84.
- 3. Some uncertainty exists as to the radiation permit for the "new" ITI x-ray inspection machine for Vanadium Aluminum product. We think ITI took out a permit when installation was made about three years ago and have maintained since. We will check and advise.
- 4. We have solid waste disposal permits although neither facility disposes of hazardous waste. Quarterly reports are filed against these permits to indicate no hazardous waste transported.
- 5. Our Hospital x-ray is antiquated and taken out of service. Permit is valid, however, but will not be renewed. IRD advised and hope to transfer. If not, it will be abandoned in place and source appropriately disposed of.
- 6. I could not find a validated permit for the Picker x-ray in the Vanadium Aluminum Department, but there is one and checks are made regularly as well as State inspection periodically.

- 7. Disposal of radioactive waste and ore was made in the Pine Avenue landfill previously owned by UCC-Metals and now owned by Cecos Int. This disposal licensed by AEC/NRC and currently under NYS DEC. We believe we do not have any responsibility in regard to this disposal, but I am sending what information I have anyway.
- 8. I made no attempt to sort out permits held by UCC Technology Dept. (R. J. Klotzbach), but I believe we transferred everything to Elkem Metals at the time of divestiture, 7/1/81, with the exception of the low level radiation within the yard area of the lease. RJK should be contacted on this.

Please advise if you need further information.

F. T. Temple

FTT ew

Att.



METALS DIVISION

INTERNAL CORRESPONDENCE

MAR O FEET 137 47th STREET, P O BOX 66, NIAGARA FALLS, NEW YORK 14302

To (Name) Mr. R. G. Beverly UCC-Metals Division Grand Junction CO

Date

March 6, 1984

Originating Dept

Answering letter date

Division

Location

C. L. Dudníck J. F. Frost

R. J. Klotzbach

Subject

Niagara Falls Permits and Licenses

Further to my letter of February 8 and J.F. Frost's letter of February 21 regarding the permit lists for Niagara Falls, the following information is available regarding the points I made:

- Items 3 & 6 X-ray Inspection Facilities for Vanadium-Aluminum. The two permits are attached herewith.
- I was able to locate the permit for the hospital x-ray, also attached.
- 3. A copy of our Permit 950-0139 for the low-level radiation from our prior ferrocolumbium operations is attached. However, the details of this should be discussed with R.J. Klotzbach.
- We are in possession of a permit, No. 955-0139, for a small radiation source which has been stored in the basement of our stores department pending disposition. That permit is also attached.

I believe this covers all the permits and licenses for the Metals Plant facility. Again you should touch base with Mr. Klotzbach for any other tag ends that they still may have.

The State Department of Environmental Conservation has been contacted by Carol Dudnick regarding the Linde SPDES and the outcome of that transfer to Metals is at this time unknown.

Please advise if you have further questions.

FTT:ew

Att.

NOTE:

All license and permits referred to in the foregoing lists and memos applicable to the Niagara Metals/Flux Operations are on file in Niagara Falls, NY and in Grand Junction, CO. If the reviewer desires more details, pleast contact R. G. Beverly in Grand Junction, CO, 303-245-3700.

R. G. Beverly